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MIGRANT AND SEASONAL FARMWORKERS
SUMMARY OF PROBLEMS

Prepared for the
Federal Regional Council, Region X

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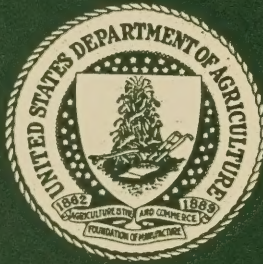
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Summary of Problems

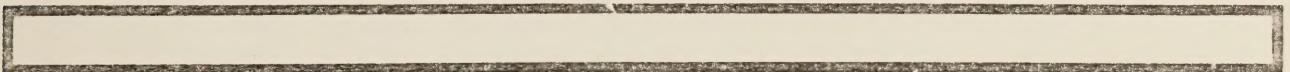
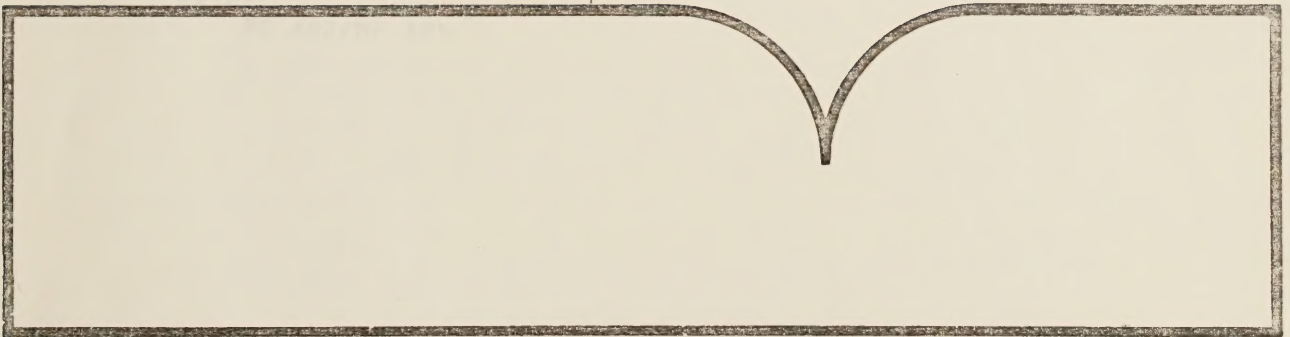
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MIGRANT AND SEASONAL FARMWORKERS

SUMMARY OF PROBLEMS

Migrant and seasonal farmworker (MSFW) problems cover the areas of health, education, employment, training, general social services, welfare assistance, economic and community development, protective legislation, housing resource allocation, planning, energy, technology, transportation, and numerous other areas--in fact, any area that would effect a rural population, poor people and a racial minority. These problems are inter-related, cannot be separated and are extremely difficult to prioritize. The description below attempts to summarize some of the features of these problems.

MSFWs can be defined, very broadly, as a group which has been estimated at approximately five million nationally who provide temporary seasonal farm labor, picking, thinning or weeding crops and fruits, working in food processing plants and in other areas of agriculture which require hand labor.² Seasonal farmworkers are generally defined as local residents who work within the area in which they live. Migrants, however, are generally individuals who cannot return to their normal home at night and live in a temporary abode while performing farm labor. In performance of their work, migrants may travel within states, intrastate migrants, or may travel across the nation, interstate migrants. Most migrants are really migrant families³ including parents and children who range in age from infants to adults.

A. General Condition of the MSFW Population

A 1978 statement of the Task Panel on Migrant and Seasonal Farmworkers of the President's Commission on Mental Health adequately summarizes the national, as well as regional, picture of MSFWs today:

American farmworkers and their families live and work under conditions which are cruel and harsh by any standard; they are ill-housed, ill-clothed, undernourished, face enormous health hazards, are underpaid, underemployed, undereducated, socially isolated, politically powerless, excluded from much of the worker protective legislation that other American workers take for granted, and are unable to compete in the labor market for the higher wages that would permit them to resolve their own problems or ameliorate the bleak reality of their existence.⁴

MSFWs are individuals who do not normally choose seasonal farmwork as an occupation but are forced to due to economic necessity.⁵ Most individuals employed in such work, whether seasonals or migrants, come from rural areas of the country, "characterized by high unemployment levels, a primarily agricultural economic base and a large group of unskilled workers."⁶ They choose temporary farmwork from lack of other occupational choice and due to personal lack of other work related skills. The profession itself, which requires long hours in hot sun or freezing cold at backbreaking, often stoop labor, has been described as the third most dangerous occupation, with farmworkers "among the lowest paid workers in the nation."⁷

Migrants are seen by local residents as transients temporarily in the community to do a job which is necessary to the economy. They are "not considered community members."⁸ As such, migrants are "psychologically and geographically isolated from the community in which they work."⁹ As temporary residents they do not vote on community issues and as such have "no officials elected to serve their interests."¹⁰

B. Policy Analysis

The major policy problem in regard to MSFWs is the lack of a comprehensive policy. As summarized by the President's Reorganization Project: "Federal policies governing assistance to migrants have been characterized by a lack of consistent long-term objectives; disagreements on the size, condition and physical location of the target population; and a fragmented approach to meeting the most basic needs of migrant workers and their families."¹¹

There are three paradoxes which exist today in regard to MSFWs which hamper development of effective policy and programs to deal with their problems. These paradoxes include: 1) economics--humanization of working conditions versus keeping food prices low; 2) illegals--question of whether illegal migrant workers are a necessary segment of the MSFW work force or take jobs away from U.S. citizens, and; 3) mechanization--technological advances versus the need to and speed of retraining the MSFW work force.

The economic paradox involves the contradiction between needing a laboring group which will perform unpleasant and hazardous temporary seasonal farm work at obscure rural locations across the country for very low wages, and voicing a concern for the health and welfare needs of this same group. The food production foundation of the country is based on the premise of availability of cheap agricultural labor.¹² To provide MSFWs higher wages, work-related benefits, adequate health services and housing, protective legislation and guaranteed access to transportation would substantially increase the cost of this labor, it is generally believed. This would be reflected in the country's food prices, paid for out of the pockets of consumers and attributable to an inflationary rise in the cost of living.

Through a need to find this source of cheap agricultural labor, agricultural producers throughout recent history have turned to the use of alien labor. Sometimes this has meant importing such labor under contracts with foreign countries, or directly or indirectly encouraging use of laborers from neighboring countries through the institution of favorable policies or the lack of enforcement of immigration laws. Use of alien labor in the United States is currently plagued by a general lack of knowledge. No one knows for sure how many illegal aliens are in the United States. No one knows the extent of their current use in agricultural labor or the impact their exclusion from this work force might have.

Enhanced by this lack of information, there remains the question, and the second paradox, of whether there is a real desire to end or a need to curb the tide of illegal workers performing seasonal farm labor in this country. Opinions are lined up on both sides of the issue. On one side, critics of the use of illegal aliens claim they tax U.S. welfare systems, send billions of dollars out of the U.S. to their families back in Mexico,¹³ take away jobs from U.S. citizens,¹⁴ depress wage scales by working below minimum wage,¹⁵ and serve as strike breakers during labor disputes.¹⁶ On the other side, critics claim that illegal aliens pay in taxes far more than they collect in benefits,¹⁷ do not work for less than the minimum wage,¹⁸ and fill jobs that are crucial to agricultural production that nobody else will take.¹⁹

Perhaps in recognition of the instability of seasonal farm labor, there has been an increase of mechanization in what was once the domain of hand farm labor. But herein lies another paradox: The extent and progress of mechanization is unknown; but it is definitely not total at this point, so retraining and redirection of MSFWs into other occupations cannot totally take place or the country would lose a much needed work force. The transition between mechanization and hand labor is not smooth and no one is sure when, if ever, this total transition will be complete.

The inevitability of increasing mechanization brings a realization of the necessity to retrain the MSFW work force for alternative employment. One estimate is that "two and a half million new jobs will be needed by 1980 to absorb workers formerly employed in agriculture."²⁰ However, there are currently few alternative employment opportunities in the rural areas in which MSFWs live.

The economic, illegals, and mechanization paradoxes are reflected in government policy regarding this group. As a result, laws which are established to protect MSFWs often fall far short, due to stipulations and special conditions under which such protection is mandated. For example, the economic paradox keeps MSFW wages low and the level of required employer supplied "fringe" benefits, e.g., housing, health services, unemployment compensation, minimal. Enforcement of immigration laws, at best a hard job, is ineffective at stopping the flow of illegals into farm work in the U.S. Special employment training programs for MSFWs are instituted in recognition of a need to retrain this work force due to increasing farm mechanization, however, the level of funding is far below that which would be needed to retrain most MSFWs, perhaps in recognition that to be successful in this retraining effort would deplete a work force much needed at the present time.

C. Demographics

No statistically valid survey of the MSFW population has ever been performed.²¹ The only information available has been derived from small studies of a select segment of the population or large scale data gathering efforts which are designed for other purposes but peripherally count MSFWs. Most studies produce number estimates of the population, which vary greatly from each other, and few studies denote characteristics data. In addition, an unknown number of MSFWs in the Region are said to be undocumented workers from Mexico. One conclusion which has been drawn is that this deficient data "is used in program planning, funding allocation and service delivery systems design."²² In addition, there are differing and often conflicting definitions of MSFWs used by federal service programs. This hampers determination of eligibility for the client and coordination of services at the local level.

The HEW Study of MSFWs in Region X, An Evaluation of Access to and Availability of Human Resources Programs for Migrant and Seasonal Farmworkers in Region X, (hereafter referred to in this paper as the "HEW Study"), performed in 1977, is the latest region-wide documentation of MSFWs. This study surveyed 450 MSFWs in the states of Idaho, Oregon and Washington and derived the following demographic picture (unless noted, it can be assumed that these characteristics were the same for MSFWs in each state):²³

*A previous study of secondary source numerical estimates of MSFWs in Region 10, defined the proportion of migrants and seasonals in each state as follows:

	<u>Idaho</u>	<u>Oregon</u>	<u>Washington</u>
<u>Migrant</u>	15%	7%	20%
<u>Seasonal</u>	7%	16%	35%
	Total: 100% in the three states.		

*Approximately 45% of the migrants in Idaho and Washington were from Texas (in Oregon only 14% were from Texas). Close to 16% of the remaining migrants were from California. Six percent of those surveyed said they were from Mexico.

*The average age for MSFWs surveyed was 31 and 50% were female.

*Eighty-five percent indicated they were "Hispanic" and 10% were "White." Other races noted included Black, American Indian, Russian and Vietnamese. Other sources have also documented Canadians performing migrant work in Washington State.

*Three-fourths of the MSFWs preferred to use Spanish in communication. Of these, 45% felt they could not communicate well in English.

*Average education was sixth grade. Only 2% had attended college, while 4% had never attended school.

*The average time spent in agricultural labor per year was 6.5 months (7.2 months in Idaho, 6.8 months in Washington and 5.4 months in Oregon).

Average family size was 4.74 persons. This was true for both migrants and seasonals.

*Mean yearly income for all MSFW families was \$3,700 with \$3,400 reported to come from seasonal farmwork. Per capita mean yearly income was calculated to be \$780. The range noted 86% of all MSFW families had income under \$6,000, while only 1% had income over \$16,000. Close to 75% of MSFW families received no form of income assistance from sources other than working.

It should be noted that income, family size and education levels reported in this 1977 survey are not much different from data obtained in a MSFW survey sponsored by OEO in 1966.²⁴ The 1977 figures for Region X are also in agreement with figures obtained in nation studies of MSFWs. This and other findings regarding problems of MSFWs leads to the conclusion that MSFWs in Region X are similar to those in the rest of the United States.

D. Social Welfare Characteristics

There are two social welfare areas for which statistics are available on both a national and local level: health and housing. These again point to the fact that Region X seems to be typical of the national picture.

1. Health

"Farmworkers are considered to have the poorest physical and mental health of any group in the United States."²⁵ The following facts indicate some of what this means:

- * Average MSFW lifespan is 49 years. Infant mortality rate for MSFWs is three times higher than the national rate.
- * "The death rate from influenza and pneumonia is 200% higher than the national rate." "Mortality rates for TB and other infectious diseases among migrants are two and one-half times the national rate."
- * "One study showed 'farmworker' children have seven times the expected mortality rate of the national average for diarrhea, an ailment which has a 'presumed preventability.'"
- * "Hospitalization of farmworkers for accidents is 50% higher than the national rate."
- * MSFWs have diseases that are "considered cured by the national population" including rickets, polio, tuberculosis and typhoid.
- * One study showed every MSFW surveyed had dental problems. Another showed 76% of MSFWs studied had dental problems. A third study indicated a "mean number of decayed teeth per farmworker as 6.8." ²⁶

At a 1977 hearing held by the Washington State House of Representatives Subcommittee on Agricultural Employment of the House Labor Committee, a Washington physician and member of the National Task Force on Migrant Education noted the following MSFW health facts for Washington State:

- * Farmworkers Family Health Clinic in Toppenish, Washington, a Migrant Health Clinic, recently showed an increase in cases of TB among patients.
- * In Sunnyside, Washington, two migrant children lost their eyesight because of parasites. Twenty percent of the MSFW children have parasites.
- * Farmworkers Family Health Clinic has noted recent cases of rickets. ²⁷

2. Housing

"The health of migrant and seasonal farmworkers is directly affected by the low quality of the housing in which they are forced to live both when in their home base and in stream."²⁸ Housing for migrants is, for the most part, either nonexistent or inadequate. Migrant housing nationally is characterized by large scale overcrowding (often requiring a household averaging in size from four to eight persons to live in one room), no electricity or plumbing, lack of insulation and generally accelerated deterioration.²⁹ A 1976 Yakima County, Washington, housing study noted, "The Department of Social and Health Services estimates 75% to 80% of the living units that migrant labor will occupy this year are seriously substandard."³⁰

Lack of temporary housing for migrants is considered by many to be the number one MSFW-related problem in Washington State. In the Yakima Valley, the heaviest agricultural producing area of the state, it is unknown how many migrants come into the area during the peak of the season or how many housing units exist (a Yakima County study found 43 labor camp sites in 1976 of which only 10% were licensed). However, "Yakima County Health District officials estimate that 80% of the migrant labor force will be forced to camp on river banks, under bridges and in other unsuitable environments,"³¹ due to lack of housing. A 1975 DSHS "Agricultural Labor Camp Report" notes an actual decrease in statewide housing capacity from 22,441 in 1969 to 14,599 in 1975.³²

The general rural housing shortage affects seasonal workers, most of whom do not own their own homes due to inability to make down payments, mortgage payments and continue maintenance costs. This is a serious problem in all three states in the Region.

E. Problem Identification

MSFWs and federal, state and local service providers surveyed in the HEW Study identified the following as the most important problems of MSFWs.³³

Rating	** Migrants	* Seasonals	All Service Providers
First Priority	Housing, Employment	Housing	Housing
Second Priority	Health Care	Employment	Health
Third Priority	Work Benefits/Wages	Work Benefits/Wages	Education

*Seasonals noted "health care" fourth.

**Migrants noted "education" fifth and seasonals noted it sixth.

In summary, migrants, seasonals and service providers all noted housing as the highest priority need of MSFWs. Migrants also indicated employment as a first priority need; seasonals listed this area as a second priority. Also in regard to MSFW needs, it should be noted that 75% of all MSFWs surveyed said they would like to leave seasonal farm work and get another job either inside or outside agriculture.

E. Service Needs and Receipt of Services

The following chart summarizes service needs and receipt of services for the MSFWs surveyed.³⁴

Services	Percent for All MSFWs Surveyed		
	%In Need of Service	%Who Tried to Receive Service of Those Needing It	%Receiving Service of Those Who Tried To Receive Service
Health	75%	99%	95%
Childcare	40% ¹	43%	59%
Disabled	83% ²	68%	74%
Job Training/ Adult Education	57%	21%	62%
AFDC/Federal Emergency Assistance	56%	27%	75%

1. Includes response by MSFWs without children and those whose children are too old to need childcare.
2. Service need was only asked of those who were disabled or had a disabled member in their family. This was approximately 10% of those surveyed (45 persons).

Summarizing this data, the study found there was a high need for, pursuit of, and receipt of health services; job training/adult education and AFDC/FEA noted a very low rate of pursuit of services by those in need of services; childcare also noted a low pursuit of needed services and the lowest actual receipt of services.

There were recorded differences between the states for need, pursuit and receipt of services. This is noted in Attachment A at the end of this paper.

G. Service Delivery Problems

The HEW Study reviewed fourteen different human services programs in Region X within the general topics of: employment training, health, education, income maintenance and social services. The study found nine general service delivery barriers which generally crossed programmatic lines and were true for each of the three states studied. These service barriers can be generalized to services other than those studied. These barriers were:³⁵

1. Problems regarding the perception of MSFWs held by service providers. These include insensitivity to MSFWs by service providers and the community in general; misconceptions about MSFWs, e.g. they love farmwork, they make a lot of money, they don't want help; and general lack of knowledge about MSFWs.
2. Lack of accurate numerical and demographic data on MSFWs. This has been discussed earlier.
3. Inability of migrants to receive services because they migrate. Many services require long periods for eligibility determination, have waiting lists or are of a long-term service delivery nature. These factors hamper migrants' receipt of services, due to their constant movement. In addition, residency requirements, differing eligibility requirements for programs from state to state and lack of record transfer systems exclude migrants from services.
4. Lack of transportation. MSFWs lack transportation with which to travel from the rural areas where they work to the larger towns and cities in which most services are found. In addition, most services are only offered during weekdays when MSFWs cannot leave work to take advantage of them.
5. Outreach is necessary to make MSFWs aware of available services. Not knowing where to go for services or that they were available was the biggest reason given by MSFWs who needed services but had not sought them. Most programs provided limited outreach and no personal outreach, the most effective means for reaching MSFWs. Many programs do not seek new clients as their services are already filled to capacity.
6. Language barriers. Most MSFWs in Region X prefer to speak Spanish and/or cannot communicate well in English. However, most programs designed for the general population do not have adequate bilingual staff. Existent bilingual staff are limited, overworked and not normally compensated for their additional translation services.
7. MSFWs, or their representatives, are not usually on advisory boards of general population programs. Lack of representation on advisory boards translates into lack of recognition and consideration of MSFWs in program and resource planning and implementation.

8. Lack of program and services coordination hampers MSFW receipt of services. Lack of program and services coordination, due to differences in program priorities, flexibility and regulations, means service gaps, and lack of service continuity for MSFWs. Despite a mandate to coordinate services in regulations of almost every program studied, most programs do not coordinate their services with others. Other reasons given for failure to coordinate were recognition that the federal level does not coordinate its services (so why should the state or local level), feelings of competing for the same client and beliefs that farmworker organizations should deal with all the problems of MSFWs even those for which other programs are funded.
9. Federal monitoring of state and local programs is inadequate. Federal monitoring can enhance or impede service delivery to and planning consideration of MSFWs. Federal monitors can strongly encourage and assist state and local grantees to serve MSFWs. Monitoring insistence on compliance rules checks rather than providing guidance on program operation hampers the programs development of consideration for this population.

Specific findings concerning problems with MSFW receipt of employment and training related services offered by "standard institutions," e.g. community colleges and vocational/technical schools, correspond to MSFW receipt of services by other mainstream institutions. These findings include:³⁶

1. Most standard institutions cannot teach anyone who cannot learn in English. They have few, if any, bilingual instructors and teach few classes in Spanish.
2. MSFWs need financial assistance in order to take training courses. Often the stipend offered is so low that the head of the family enrolled in a training program finds it an economic necessity to drop out of training and take his/her family back into seasonal farmwork during the peak agricultural season.
3. The time of the day and seasonal time of the year most training courses are offered are problems for MSFWs who prefer to attend evening classes during winter or off-agricultural season.
4. Most training programs require at least a 10th grade education and often a high school diploma or GED for entrance. MSFWs with their average 6th grade education do not qualify. Many training programs which provide stipends have a two-year limitation for enrollment of one client. MSFWs in two years cannot upgrade their educational level enough to enter and receive training in these programs.
5. There is a lack of employment alternatives in rural areas for which to retrain MSFWs. Often it is only possible to train individuals for occupations which they can only practice if they move to an urban area.
6. Program funding for stipends or development of special training programs for MSFWs is limited so only a limited number of MSFWs are able to receive such training.

In addition to these six barriers, findings regarding availability of transportation, perception of MSFWs by service providers, outreach activities and coordination between programs also apply to MSFW receipt of services at "standard" institutions.

ATTACHMENT A

NEED, PURSUIT AND RECEIPT OF SERVICES BY STATE
FOR ALL MSFWS SURVEYED

Service	% In Need Of Service			%Who Tried to Receive Service of Those Needing Service			%Receiving Service Of Those Who Tried To Receive Service		
	ID	OR	WA	ID	OR	WA	ID	OR	WA
Health	87%	88%	63%	100%	97%	99%	100%	92%	72%
Childcare	80%	27%	28%	17%	63%	67%	46%	88%	50%
Disabled	88%	81%	81%	57%	69%	71%	67%	63%	88%
Job Training/ Adult Education	58%	68%	51%	13%	35%	17%	33%	71%	57%
AFDC/FEA	68%	74%	43%	30%	39%	20%	81%	85%	67%

Summary:

1. Washington MSFWS note a lower need for and receipt of health services than in the other two states.
2. Childcare seems to be a bigger problem in Idaho than the other states. Idaho notes a much higher need, much lower pursuit of and slightly lower receipt of this service than the other states.
3. Pursuit of job training/adult education was particularly low in Idaho and Washington. Receipt of these services by those who tried to receive such services was lowest in Idaho. In conclusion, more MSFWS pursued and received job training/adult education services in Oregon than in the other two states.
4. The need for, pursuit of and receipt of AFDC/FEA services was lowest in Washington.

Source: HEW Study, pp. 234-236.

FOOT NOTES

1. Task Panel on Migrant and Seasonal Farmworkers of the President's Commission on Mental Health, Report of the Task Panel (Washington D.C., 1978), p. 12. Current estimates of the MSFW population range from 250,000 to 6 million.
2. Some definitions of MSFWs include migrant fishermen and migrant workers in the lumber industry. These categories are not usually considered to be MSFWs by service providers in this Region.
3. It is "assumed" by most sources that most migrants are really migrant families although no definitive statistics have proven this fact. Many migrants are single men who leave their families at home and travel either by themselves or in crews made up of single men. In other instances, many working couples leave their children at home with relatives or friends (sometimes so the children can remain in school) while they perform migratory farm labor. On the other hand, many migrant families (really households) have been found to be made up of a nuclear family, including children; members of the extended family, grandparents, uncles, etc.; and children of neighbors families "back home" who are not directly related to others in the household.
4. Task Panel on MSFWs, op. cit., p. 6.
5. Subcommittee on Agricultural Labor of the Committee on Education and Labor, U.S. House of Representatives, 94th Congress, 2nd Session, Federal and State Statutes Relating to Farmworkers (Washington, D.C., 1976), p. 100-101.
6. InterAmerica Research Associates, An Assessment of the Migrant and Seasonal Farmworker Situation in the United States, performed under contract to the Community Services Administration (Washington, D.C., 1976), p. 24.
7. Ibid.
8. InterAmerica Research Associates, An Evaluation of Access to and Availability of Human Resource Programs for Migrant and Seasonal Farmworkers in Region X, performed under contract to the U.S. Department of Health, Education and Welfare, Region X (Seattle, Washington, 1978), p. 35.
9. InterAmerica, An Assessment, op. cit., p. 255.
10. Ibid.
11. President's Reorganization Project, "Migrant Transfer Options," (Washington, D.C., July, 1978), p. 1.
12. Yakima County Conference of Governments, Yakima County Housing, Market Analysis (Yakima, Washington, 1976), p. 35.

13. U.S. News and World Report, "Illegal Aliens: Invasion Out of Control?" January 29, 1979, p. 39.
14. Los Angeles Herald-Examiner, "Illegal Aliens: Are Job Fears Unfounded?" November 8, 1978.
15. Ibid.
16. National Association of Farmworker Organizations, Fifth Annual Conference (Washington, D.C.), January, 1979. Independent and Gazette, "Chavez, UFW Quietly Solidify Gains," California, November 13, 1978.
17. U.S. News and World Report, op. cit., p. 39.
18. L.A. Herald-Examiner, "Illegal Aliens," op. cit.
19. Time, "Its Your Turn in the Sun, Now 19 Million and Growing Fast, Hispanics Are Becoming a Power," October 16, 1978, p. 61.
20. Edward G. Baumheier, et. al., The Migrant Farm Worker: Social Programs, Policies, and Research (Social Welfare Research Institute, Center for Social Research and Development, University of Denver, Denver, Colorado, 1973), p. 78.
21. The following studies are some of those which have documented the lack of demographic and numerical data on MSFWs:

Commission on Civil Rights, Counting the Forgotten (Washington, D.C.), 1974.

InterAmerica, An Assessment, op. cit.

InterAmerica, An Evaluation, op. cit.

InterAmerica Research Associates, Migrant Child Welfare: A State of the Field Study of Child Welfare Services for Migrant Children and Their Families Who Are In-Stream, Home Based or Settled Out, A Review of the Literature and Legislation, performed under contract to the National Center for Child Advocacy, Children's Bureau, Office of Child Development, U.S. Department of Health, Education and Welfare (Washington, D.C., 1977).

InterAmerica Research Associates, Region X Migrant and Seasonal Farmworker Population Estimators Report, performed under contract to the U.S. Department of Health and Welfare, Region X (Seattle, Washington, 1977).

Legal Services Corporation, An Estimate of the Number of Migrant And Seasonal Farmworkers in the United States and the Commonwealth of Puerto Rico (Washington, D.C., 1977).

National Association of Farmworker Organizations, Report of the Fourth Annual Conference (Washington, D.C., 1977).

Task Panel on MSFWs, op. cit.

Rural America, Where Have All the Farmworkers Gone? (The Statistical Annihilation of Hired Farmworkers), An Analysis of the Federal Effort to Define and Count Migrant and Seasonal Farmworkers (Washington, D.C., 1977).

U.S. Department of Health, Education and Welfare, Office of the Secretary, HEW Policy with Respect to Migrant and Seasonal Farmworkers (Washington, D.C., 1978).

22. InterAmerica, An Evaluation, op. cit., p. 42.
23. Ibid., pp. 10-13.
24. Consulting Services Corporation, Migrant Farmworkers in the State of Washington, performed under contract to the Office of Economic Opportunity, Washington, D.C. (Seattle, Washington, 1966).
25. InterAmerica, An Assessment, op. cit., p. 126.
26. InterAmerica, An Evaluation, op. cit., p. 182-183.
27. House Subcommittee on Agricultural Employment, Committee on Labor, "Summary of Comments, Hearings on MSFWs," July 21, 1977 (Olympia, Washington), p.2 (internal document).
28. HEW, HEW Policy, op. cit., p. 60.
29. InterAmerica, An Assessment, op. cit., pp. 215-217, 226.
30. Yakima County Conference of Governments, op. cit., p. 35.
31. Ibid.
32. Washington State Department of Employment Security, "Washington State Agricultural Labor Parks Proposal," (internal document), p.34.
33. InterAmerica, An Evaluation, op. cit., pp. 15-16.
34. Ibid., pp. 234-236.
35. Ibid., pp. 34-95.
36. Ibid., pp. 113-128.

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